

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to the Debtors and Debtors in Possession

In re:

NEW JERSEY ORTHOPAEDIC INSTITUTE LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 25-11370 (JKS)

(Jointly Administered)

Re: Doc. No. 67

**CERTIFICATION OF NO OBJECTION TO DEBTORS' MOTION FOR
AN ORDER EXTENDING THE DEADLINE FOR THE DEBTORS
TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL
REAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(4)**

The undersigned counsel to the above-captioned debtors and debtors-in-possession (the “**Debtors**”) hereby certifies that:

1. On May 16, 2025, the *Debtors’ Motion for an Order Extending the Deadline for the Debtors to Assume or Reject Unexpired Leases of Nonresidential Real Property Pursuant to 11 U.S.C. § 365(d)(4)* [D.I. 67] (the “**Motion**”) was filed with the Court.

¹ The last four digits of Debtor New Jersey Orthopaedic Institute LLC’s tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC’s tax identification number are 9828. The location of both Debtors’ principal place of business and the Debtors’ service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

2. Pursuant to the Notice of Motion [D.I. 67], objections, if any, to the Motion were required to have been filed with the Court and served on the undersigned so as to be received on or before June 3, 2025 (the “**Objection Deadline**”).

3. The Objection Deadline has passed and no formal objections or responses were served upon the undersigned counsel or entered on the Court’s docket.

4. Accordingly, the Motion may be approved.

WHEREFORE, the Debtors respectfully request that an order, substantially in the form attached to the Motion and hereto as **Exhibit A**, be entered at the earliest convenience of the Court.

Dated: June 4, 2025

SAUL EWING LLP

By: /s/ Stephen B. Ravin
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EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
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In re:

NEW JERSEY ORTHOPAEDIC INSTITUTE LLC,
et al.,

Debtors.¹

Chapter 11

Case No. 25-11370 (JKS)

(Jointly Administered)

**ORDER EXTENDING THE DEADLINE FOR THE DEBTORS TO
ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL
REAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(4)**

The relief set forth on the following page numbered two (2) through three (3) is hereby
ORDERED.

¹ The last four digits of Debtor New Jersey Orthopaedic Institute LLC's tax identification number are 3560; the last four digits of Debtor Northlands Orthopaedic Institute LLC's tax identification number are 9828. The location of both Debtors' principal place of business and the Debtors' service address in these Chapter 11 Cases is 504 Valley Road, Suite 200, Wayne NJ 07470.

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Debtors: New Jersey Orthopaedic Institute LLC, *et al.*

Case No. 25-11370 (JKS)

Caption: ORDER EXTENDING THE DEADLINE FOR THE DEBTORS TO ASSUME OR REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY PURSUANT TO 11 U.S.C. § 365(d)(4)

AND NOW, upon consideration of the of the Debtors' Motion (the "Motion")² for entry of an order granting Debtors an extension, through and including September 8, 2025, of the statutory deadline for the Debtors to assume or reject the Real Property Leases; and it appearing that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court being able to issue a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided under the particular circumstances, and it appearing that no other or further notice need be provided; and after due deliberation; and sufficient cause appearing therefor, it is hereby ORDERED and DECREED as follows:

1. The Motion is GRANTED as set forth herein.
2. Pursuant to section 365(d)(4) of the Bankruptcy Code, the Assumption/Rejection Deadline is hereby extended through and including September 8, 2025.
3. This Order shall be without prejudice to the rights of the Debtors and their estates to seek further extensions of the Assumption/Rejection Deadline with the consent of the affected lessors.
4. Nothing contained herein shall be deemed to (a) authorize the assumption or rejection of any of the Real Property Leases or (b) determine whether any of the Real Property

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

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Debtors: New Jersey Orthopaedic Institute LLC, *et al.*

Case No. 25-11370 (JKS)

Caption: ORDER EXTENDING THE DEADLINE FOR THE DEBTORS TO ASSUME OR
REJECT UNEXPIRED LEASES OF NONRESIDENTIAL REAL PROPERTY
PURSUANT TO 11 U.S.C. § 365(d)(4)

Leases or other agreements to which any of the Debtors is a party is an unexpired lease of nonresidential real property with the meaning of section 365(d) of the Bankruptcy Code.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

6. This Court retains jurisdiction with respect to all matters arising from or relating to the interpretation or implementation of this Order.